

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARNELL BAILEY	:	No. 02-CV-4683
3563 Driftwood Place	:	
Bethlehem, PA 18020	:	
	:	
v.	:	
	:	
LUCENT TECHNOLOGIES INC.	:	JUDGE JAMES KNOLL GARDNER
555 Union Boulevard	:	
Allentown, P A 18109-3286	:	
	:	
AND	:	
	:	
AGERE SYSTEMS INC.	:	
555 Union Boulevard	:	
Allentown, PA 18109-3286	:	

**MOTION TO COMPEL RESPONSES TO
REQUEST FOR PRODUCTION OF DOCUMENTS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES plaintiff Garnell Bailey who files this Motion to Compel Responses to Request for Production of Documents, and in support thereof would show the Court the following:

On or about March 27, 2003, Plaintiff prepared and served her request for production of documents upon defendants. On or about June 10, 2003, Defendants upon served plaintiffs incomplete responses to plaintiff's request for production of documents.

WHEREFORE, Plaintiff prays that this motion be set for hearing and upon a hearing hereof the Respondents be ordered to respond to the above referenced Request for Production within ten (10) days after the date of hearing and that the Court order such sanctions as it deems appropriate under Rule, and the rules cited therein.

Respectfully submitted,

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Attorney for Plaintiff
LAW OFFICES OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion to Compel was mailed by first class mail this _____ day of _____, 2003, to:

Robert W. Cameron, Esquire
Littler, Mendelson
Dominion Tower
625 Liberty Avenue, 26th Floor
Pittsburgh, PA 15222

Theodore A. Schroeder, Esquire
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